



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

JUL 28 2015

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Article Number: 7014 1200 0000 6125 8836

Mr. John Riles
Facility Manager
Chantland-PVS Company
2512 Lincoln Avenue
Humboldt, Iowa 50548

RE: Chantland-PVS
Humboldt, Iowa
EPA RCRA ID No.: IAD981707235

Dear Mr. Riles:

Request for Information

On September 16-17, 2014, representatives of the U.S. Environmental Protection Agency (EPA) inspected your facility. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA).

My staff has reviewed the inspection report. To date, the EPA has not received a response from you regarding the preliminary findings that were outlined in the inspection report that was sent to you on November 19, 2014. The EPA has determined that violations of RCRA were documented. We are requesting additional information regarding your facility's compliance status. Enclosed is a list of violations, a list of questions and/or requested information, and instructions to be used in providing your response. Please carefully read and follow these instructions. Your response to this request in accordance with the instructions is required by Section 3007 of RCRA and substantial penalties may result from not complying. Please note that the EPA reserves its right to pursue appropriate enforcement actions, including penalties, for violations discovered as a result of the inspection, regardless of whether the violations were subsequently corrected.



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Within thirty (30) calendar days of receiving this letter, please mail your response to: Berla Y. Johnson, Environmental Scientist, AWMD/WEMM, U.S. Environmental Protection Agency, 11201 Renner Blvd., Lenexa, Kansas 66219. To request an extension of the time limit, follow the instructions in the enclosure. Please direct all questions concerning this letter to Ms. Johnson, of my staff, at 913-551-7720 or jackson-johnson.berla@epa.gov.

Sincerely,



Donald Toensing
Chief

Waste Enforcement and Materials Management
Branch
Air and Waste Management Division

Enclosures

cc: Cal Lundberg, Chief Contaminated Sites Section
Iowa Department of Natural Resources

List of Violations
Chantland-PVS
2512 Lincoln Avenue
Humboldt, Iowa
RCRA ID No.: IAD981707235

1. 40 CFR 262.11 – Failure to make hazardous waste determinations on the following materials:
 - Cleaning supplies stored in the storage loft of the maintenance shop: (1) one full 1-gallon container of Spartan window cleaner, (2) one full 1-gallon container of Gaylord Industrial DMSO, (3) one full 1-gallon container of JC Gym Finish by Janitor's Closet, (4) Chem-Dip Carburetor and Parts Cleaner which contains methyl chloride according to the label.
 - Oily coolant waste from the evaporator unit process.
 - Used oil sludge from the evaporator unit process.
 - Universal waste lamps stored in a loft located above the maintenance shop and administrative offices: (1) Three hundred twenty five 4-foot "Silver Tip" waste lamps and approximately twenty five 8-foot "Green Tip" waste lamps.
 - Waste floor dry.
 - Waste glue rollers.
 - Waste glue brushes.
 - Waste Clean "N Etch Wipes and Liquid.
 - Spent paint booth filters
2. Failure to comply with generator requirements.
 - 40 CFR 262.34(a)(1)(i) - failure to inspect containers that were transported from the main building to the hazardous waste storage shed for storage.
 - 40 CFR 262.34(c)(1)(ii) - failure to label two small 5-gallon hazardous waste satellite containers sitting on the floor near a closed, labeled 55-gallon drum.
 - 40 CFR 262.34(d)(5)(ii) - failure to post the location of fire extinguishers and spill control equipment in the window located in front of a telephone operator.
 - 40 CFR 262.34(d)(4) – failure to coordinate emergency planning with local law enforcement and the regional medical center.
3. Failure to comply with universal waste requirements, which included:
 - 40 CFR 273.13(d)(1) - failure to keep universal waste-lamps in a closed container, that were being stored above the maintenance shop.
 - 40 CFR 273.14(e) - failure to properly label universal waste-lamps that were being stored above the maintenance shop.
 - 40 CFR 273.15(b)(c) - failure to document length of time universal waste lamps were accumulated, that was being stored above the maintenance shop.
4. Failure to comply with used oil requirements, which included:
 - 40 CFR 279.22(d)(3) - failure to clean up used oil spill that leaked out from beneath the truck trailer. The puddle was approximately 2½ feet long by 1½ feet wide at the widest point.

List of Requested Information
Chantland-PVS
2512 Lincoln Avenue
Humboldt, Iowa
RCRA ID No.: IAD981707235

1. Provide waste determination results, for each of the twelve waste streams identified in Number One of the enclosed List of Violations. If you apply knowledge of the material to make the waste determination, provide a detailed explanation and your reasoning regarding the basis for this determination. This should include a statement as to whether negative or positive determinations were made.
2. Provide reports that document how often the hazardous waste storage shed was inspected for container leaks and spills. Provide a description of compliance activities Chantland-PVS was implementing at the time of the inspection that addressed the facilities compliance with generator requirements discussed in Number Two of the enclosed List of Violations. Provide any current activities or changes your facility has implemented to correct those violations.
3. Provide documentation of activities Chantland-PVS was implementing, and is currently implementing that address proper containment and labeling of universal waste materials. Also provide documentation that shows the length of time universal waste lamps were stored and are now being stored.
4. Provide documentation of all activities performed to clean up the used oil spill documented during the inspection.

3007 RESPONSE INSTRUCTIONS

- * Identify the Person(s) responding to this request on your behalf.
- * Address each numbered item separately, and precede each answer with the number of the item to which it responds.
- * For each numbered item, identify all documents consulted, examined, or referred to in the preparation of the answer, or that contain information responsive to the requested item. Provide true, accurate, and legible copies of all such documents. (If information responsive to an item is available but there are no relevant source documents, you must still provide the information.)
- * For each document provided, indicate on the document (or in some similar manner) the number of the item to which it responds.
- * For each numbered item, identify all persons consulted in the preparation of the answer.
- * For purposes of this request, the term "you" or "your" refers to the company, corporation and any officer, principal, agent employee, or any other person(s) associated in any capacity.
- * If information responsive to a requested item is not in your possession, identify the person(s) from whom the information may be obtained.
- * If information that is not known or available at the time you make your response later becomes known or available to you, you must supplement your response.
- * If, at any time after you submit your response, you find that any part of the information you submitted is incomplete, false, or misrepresents the truth, you must notify the EPA immediately.
- * You must provide the requested information even though you consider it confidential information or trade secrets. If you want to make a confidentiality claim covering part or all of the information submitted, identify the material with words such as "trade secret," "proprietary," or "company confidential."
- * The EPA will disclose this information only to the extent and by the means described in 40 CFR Part 2, Subpart B., provided that it qualifies as confidential business information.
- * A request for an extension to the time limit for responding must be in writing and must be postmarked within five (5) calendar days of receipt of this information request. Address it to the person identified in the cover letter to receive your response.
- * Copies of the Code of Federal Regulations may be obtained from the U.S. Government Bookstores or on the Internet at www.epa.gov/epahome/cfr40.htm.
- * This request for information is not subject to the approval requirements of the Paperwork Reduction Act of 1980.

Not responding to this information request within the stated time limit and in accordance with these instructions may subject your facility to an enforcement action which could include the imposition of penalties of up to \$37,500 per violation, per day of continued noncompliance. Providing false, fictitious, or fraudulent statements or representations could lead to criminal penalties.

